

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<p>In re:</p> <p>FTX TRADING LTD., <i>et. al.</i>,<sup>1</sup></p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 22-11068 (JTD)</p> <p>(Jointly Administered)</p> <p><b>Hearing Date: Only if objections are filed</b> <b>Objections Due: February 27, 2023 at 4:00 p.m. (ET)</b></p>
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**FIRST MONTHLY FEE STATEMENT OF ALIXPARTNERS, LLP, FORENSIC  
INVESTIGATION CONSULTANT TO THE CHAPTER 11 DEBTORS AND  
DEBTORS-IN-POSSESSION, FOR COMPENSATION FOR PROFESSIONAL SERVICES  
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR  
THE PERIOD FROM NOVEMBER 28, 2022 THROUGH DECEMBER 31, 2022**

<b>Name of Applicant:</b>	<b>ALIXPARTNERS, LLP</b>
<b>Authorized to provide professional services to:</b>	<b>The Debtors and Debtors-in-Possession</b>
<b>Date of Retention:</b>	<b>January 20, 2023 <i>nunc pro tunc</i> to November 28, 2022 [Docket No. 546]</b>
<b>Period for which compensation and reimbursement is sought:</b>	<b>November 28, 2022 through December 31, 2022</b>
<b>Amount of compensation sought as actual, reasonable and necessary:</b>	<b>\$1,103,379.25</b>
<b>80% of Compensation sought as actual, reasonable and necessary:</b>	<b>\$882,703.40 (80% of \$1,103,379.25)</b>
<b>Amount of Expense Reimbursement sought as actual, reasonable and necessary:</b>	<b>\$21,288.04</b>

**This is a(n):** ☒ **Monthly** ☐ **Interim** ☐ **Final application**

**The total time expended for fee application preparation is approximately 1.6 hours and the corresponding compensation requested is approximately \$963.50.**

<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

**ALIXPARTNERS, LLP****SUMMARY OF MONTHLY FEE STATEMENTS**

<b>Date Filed; Docket No.</b>	<b>Period</b>	<b>Requested</b>		<b>Paid</b>		<b>Certificate of No Objection</b>	<b>Amount Outstanding</b>
		<b>Fees</b>	<b>Expenses</b>	<b>Fees</b>	<b>Expenses</b>		
02/07/2022 Docket #N/A	11/28/2022 - 12/31/2022	\$ 1,103,379.25	\$ 21,288.04				\$ 1,124,667.29
<b>Total</b>		<b>\$ 1,103,379.25</b>	<b>\$ 21,288.04</b>	<b>\$ -</b>	<b>\$ -</b>		<b>\$1,124,667.29</b>

## ALIXPARTNERS, LLP

**SUMMARY OF HOURS AND FEES BY PROFESSIONAL  
FROM NOVEMBER 28, 2022 THROUGH DECEMBER 31, 2022**

Professional	Title	Rate	Hours	Fees
Matthew Jacques	Managing Director	\$1,220	45.1	\$ 55,022.00
Matthew Evans	Managing Director	\$1,160	55.6	64,496.00
Charles Cipione	Managing Director	\$1,160	92.7	107,532.00
David J. White	Managing Director	\$1,085	127.3	138,120.50
David Waterfield	Director	\$945	10.2	9,639.00
John C. LaBella	Director	\$945	128.0	120,960.00
Adam Searles	Director	\$880	82.8	72,864.00
Justin Sutherland	Director	\$880	79.9	70,312.00
Lilly M. Goldman	Director	\$880	57.1	50,248.00
Brent Robison	Director	\$880	30.2	26,576.00
Todd Toaso	Director	\$880	5.4	4,752.00
Travis Phelan	Director	\$880	52.9	46,552.00
Dana Schwartz	Director	\$840	136.5	114,660.00
Elizabeth S. Kardos	Director	\$750	15.7	11,775.00
Hoyle J. Fulbright	Senior Vice President	\$795	11.9	9,460.50
Bennett F. Mackay	Senior Vice President	\$700	41.5	29,050.00
Ezra Roth	Senior Vice President	\$700	8.8	6,160.00
Kristina Galbraith	Senior Vice President	\$700	2.4	1,680.00
Vaibhav Asher	Senior Vice President	\$700	43.8	30,660.00
Joseph Demyanovich	Senior Vice President	\$670	6.3	4,221.00
Kaitlyn A. Sundt	Senior Vice President	\$550	45.5	25,025.00
Varun Kotharu	Vice President	\$555	57.0	31,635.00
Aidan Walker	Vice President	\$510	1.8	918.00
Elizabeth Teifer	Vice President	\$510	57.6	29,376.00
Brooke Filler	Vice President	\$485	60.9	29,536.50
Lisa Marie Bonito	Vice President	\$475	4.1	1,947.50
Chenxi Xu	Consultant	\$455	45.5	20,702.50
Yuqing Tong	Consultant	\$455	34.3	15,606.50
<b>Total Hours and Fees for Professionals</b>			<b>1,340.8</b>	<b>\$ 1,129,487.00</b>
Less: 50% Travel Fees				(26,107.75)
<b>Total Fees for Professionals</b>				<b>\$ 1,103,379.25</b>
Less: 20% Holdback				(220,675.85)
<b>Total Fees for Professionals</b>				<b>\$ 882,703.40</b>
<b>Average Billing Rate</b>				<b>\$ 822.93</b>

**ALIXPARTNERS, LLP****SUMMARY OF HOURS AND FEES BY MATTER CATEGORY<sup>2</sup>  
FROM NOVEMBER 28, 2022 THROUGH DECEMBER 31, 2022**

<b>Code</b>	<b>Matter Category</b>	<b>Hours</b>	<b>Fees</b>
1.1	Chapter 11 Process / Case Management	192.3	\$ 176,989.00
1.2	Communication & Meetings with Interested Parties	88.1	90,660.50
1.3	Communication with Regulatory Parties	-	-
1.4	U.S. Trustee / Court Reporting Requirements	-	-
1.5	Forensic Analysis	293.2	255,558.50
1.6	Document Review	221.8	190,780.00
1.7	Interviews	-	-
1.8	Public Data & Research	49.9	48,889.00
1.9	Claims Process	-	-
1.10	E-Discovery	188.4	128,948.00
1.11	Reporting & Presentation of Findings	132.5	115,193.00
1.12	Preparation for / Attend Court Hearings	-	-
1.13	Retention Applications & Relationship Disclosures	121.3	69,290.00
1.14	Fee Applications	1.6	963.50
1.15	Financial Statement Reconstruction	-	-
1.31	Travel Time	51.7	26,107.75
	<b>Total Hours and Fees By Matter Category</b>	<b>1,340.8</b>	<b>\$ 1,103,379.25</b>

Average Billing Rate \$ 822.93

<sup>2</sup> The subject matter of certain time entries may be appropriate for more than one matter category. In such instances, time entries generally have been included in the most appropriate category. Time entries do not appear in more than one category.

**ALIXPARTNERS, LLP****SUMMARY OF EXPENSES  
FROM NOVEMBER 28, 2022 THROUGH DECEMBER 31, 2022**

<b>Expense Category</b>	<b>Amount</b>
Airfare	\$ 8,690.78
Ground Transportation	2,654.65
Internet	92.95
Lodging	8,639.34
Meals	805.20
Parking & Tolls	288.00
Subscriptions	117.12
<b>Total Expenses</b>	<b>\$ 21,288.04</b>

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et. al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**Hearing Date: Only if objections are filed**

**Objections Due: February 27, 2023 at 4:00 p.m. (ET)**

**FIRST MONTHLY FEE STATEMENT OF ALIXPARTNERS, LLP, FORENSIC  
INVESTIGATION CONSULTANT TO THE CHAPTER 11 DEBTORS AND  
DEBTORS-IN-POSSESSION, FOR COMPENSATION FOR PROFESSIONAL SERVICES  
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR  
THE PERIOD FROM NOVEMBER 28, 2022 THROUGH DECEMBER 31, 2022**

AlixPartners, LLP ("AlixPartners"), as forensic investigation consultant to the above-captioned debtors and debtors-in-possession (collectively, the "Debtors"), hereby submits its first monthly fee statement (the "Monthly Fee Statement") for allowance of compensation for professional services rendered and reimbursement of out-of-pocket expenses incurred for the period from November 28, 2022 through December 31, 2022 (the "Fee Period"). AlixPartners respectfully states as follows:

**Jurisdiction and Venue**

1. The United States Bankruptcy Court for the District of Delaware (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant

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<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

to 28 U.S.C. § 157(b)(2).

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

### **Relief Requested**

3. The bases for the relief requested herein are Sections 330 and 331 of Title 11 of the United States Bankruptcy Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-2 of the *Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware* (the “Local Rules”), the *United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, adopted June 11, 2013 (the “U.S. Trustee Guidelines”) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 435] (the “Interim Compensation Order”).

### **Background**

4. On November 11 and November 14, 2022 (as applicable, the “Petition Date”), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, thereby commencing the above-captioned chapter 11 cases (the “Chapter 11 Cases”) in this Court.

5. Joint administration of the Chapter 11 Cases was authorized by the Court by entry of an order on November 22, 2022 [D.I. 128].

6. No trustee or examiner has been appointed in these Chapter 11 Cases.

7. On December 15, 2022, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed the Official Committee of Unsecured Creditors (the “Committee”) [Docket No. 231].

8. On December 21, 2022, the Debtors filed their *Application for an Order Authorizing the Retention and Employment of AlixPartners, LLP as Forensic Investigation Consultant to the*

*Debtors Nunc Pro Tunc to November 28, 2022* [Docket No. 277].

9. On January 20, 2023, the Court entered the *Order Authorizing the Retention and Employment of AlixPartners, LLP as Forensic Investigation Consultant to the Debtors Nunc Pro Tunc to November 28, 2022* [Docket No. 546] (the “Retention Order”).

10. The Retention Order approved the terms of AlixPartners’ hourly fee and expense structure set forth in the engagement letter dated November 28, 2022 (the “Engagement Letter”) and authorized AlixPartners to be compensated and reimbursed pursuant to section 327 of the Bankruptcy Code in accordance with the terms of the Engagement Letter, subject to the procedures set forth in the Bankruptcy Code, Bankruptcy Rules, Local Rules, U.S. Trustee Guidelines and the Interim Compensation Order, and any other applicable orders of this Court.

11. Pursuant to the Engagement Letter, Matthew Evans is the Partner & Managing Director responsible for this engagement, assisted by a staff of consultants at various levels with a wide range of relevant skills and abilities.

12. The Interim Compensation Order provides that upon the expiration of the objection deadline (the “Objection Deadline”), a professional may file a certificate of no objection (a “CNO”) with the Court with respect to any professional fees and out-of-pocket expenses not subject to objection. After a professional files a CNO, the Debtors are authorized to pay the professional 80% of the fees and 100% of the expenses not subject to an objection that are requested in the applicable Monthly Fee Application.

**Fees and Expenses During the Fee Period**

13. During the Fee Period, AlixPartners provided an aggregate of 1,340.8 hours of professional services in the amount of \$1,103,379.25 and incurred out-of-pocket expenses in the amount of \$21,288.04. After applying a 20% holdback of fees in the amount of \$220,675.85,



AlixPartners seeks payment of 80% of fees for services rendered in the amount of \$882,703.40 and 100% of expenses incurred in the amount of \$21,288.04, for a total payment of \$903,991.44 for the Fee Period.

14. A detailed itemization, by matter category, of all services performed by AlixPartners with respect to the Chapter 11 Cases during the Fee Period is attached hereto as **Exhibit A**. This detailed itemization complies with Local Rule 2016-2 in that each time entry contains a separate time allotment, a description of the type of activity and the subject matter of the activity, all time is billed in increments of one-tenth (1/10) of an hour, time entries are presented chronologically in categories, and all meetings or hearings are individually identified. All services for which AlixPartners requests compensation were performed for, or on behalf of, the Debtors.

15. A detailed list of the out-of-pocket expenses incurred during the Fee Period are attached hereto as **Exhibit B**.

16. In accordance with section 330 of the Bankruptcy Code, AlixPartners seeks reimbursement only for the actual cost of such expenses to AlixPartners. AlixPartners submits that all such expenses incurred were customary, necessary and related to the Chapter 11 Cases and, by this Monthly Fee Statement, requests reimbursement of the same.

**Summary of Services Rendered During the Fee Period**

17. During the Fee Period, AlixPartners has conducted investigative inquiries and assisted the Debtors with (i) communications and meetings with stakeholders and their representatives; (ii) engaging in forensic analysis of financial and accounting data, trading records, and other associated data to determine intercompany loans, conduct liability analysis, and aid asset recovery efforts; (iii) review and analysis of Debtors' historical organizational documents, policies and procedures, and internal electronical communications; (iv) research into public data of crypto markets, asset pricing,

and other information regarding crypto exchanges and market participants; (v) collecting and structuring financial and accounting data to aid with forensic investigation efforts; (vi) prepare summaries from forensic investigation efforts aimed at asset recovery; and (vii) analysis of available structured and unstructured financial data to support construction of historical quarterly financial data for Debtor entities.

**Services By Category Provided During the Fee Period**

18. AlixPartners classified the services performed into separate categories. The descriptions below summarize the services provided by AlixPartners to the Debtors during the Fee Period.

**Matter Code 1.1: Chapter 11 Process/Case Management**

**192.3 hours - \$176,989.00**

- Organized and managed the Debtors' resources to effectively and efficiently plan, coordinate and manage the Chapter 11 process
- Reviewed and maintained dockets and case calendars
- Held working sessions to keep the engagement team informed of the latest case developments, remain aligned on the many workstreams, verify that resources are properly allocated to meet deadlines, and ensure all matters and issues are addressed in an efficient and timely manner

**Matter Code 1.2: Communication & Meetings with Interested Parties**

**88.1 hours - \$90,660.50**

- Met and communicated with, and prepared summaries for, various other Debtor professionals and/or their advisors, the U.S. Trustee, and other parties in interest

**Matter Code 1.5: Forensic Analysis**

**293.2 hours - \$255,558.50**

- Reviewed and analyzed financial data including, but not limited to, bank records, trading records, accounting or finance documents, and other data related to assets
- Traced cryptocurrency tokens and other digital assets on and off blockchains
- Analyzed smart tokens or DeFi products
- Conducted forensic analysis of digital artifacts and devices

**Matter Code 1.6: Document Review**

**221.8 hours - \$190,780.00**

- Reviewed documents including, but not limited to, memoranda, electronic communications (emails, instant messages, etc.), reports, policies and procedures

**Matter Code 1.8: Public Data & Research**

**49.9 hours - \$48,889.00**

- Obtained, reviewed and analyzed publicly available data sources including but not limited to crypto markets, asset pricing, trading volume, contract specifications and information regarding crypto exchanges and market participants

**Matter Code 1.10: E-Discovery**

**188.4 hours - \$128,948.00**

- Collected, processed and organized data
- Communicated and coordinated with Debtors' counsel regarding search terms, document review processes, privilege review and deadlines
- Prepared requested documents for production in discovery

**Matter Code 1.11: Reporting & Presentation of Findings**

**132.5 hours - \$115,193.00**

- Prepared and reviewed summaries from forensic investigation efforts
- Prepared oral presentations of findings
- Presented investigative findings

**Matter Code 1.13: Retention Application & Relationship Disclosures**

**121.3 hours - \$69,290.00**

- Drafted AlixPartners' retention application, proposed orders and declarations
- Analyzed relationship disclosures required by the Bankruptcy Code
- Communications regarding AlixPartners' retention
- Responded to inquiries from the U.S. Trustee regarding AlixPartners' retention

**Matter Code 1.14: Fee Statements & Fee Applications**

**1.6 hours - \$963.50**

- Managed the fee application process in accordance with requirements of the U.S. Trustee and/or the Court.
- Drafted fee application

**Matter Code 1.31: Travel Time**

**51.7 hours - \$26,107.75**

- Traveled to meetings outside of consultants' respective "home" office region (Hours billed under this category were billed at 50% of AlixPartners' standard rates)

19. AlixPartners believes that the fees and out-of-pocket expenses requested are reasonable, actual and for necessary services rendered or expenses incurred on behalf of the Debtors during the Fee Period.

20. AlixPartners has not entered into any agreement, express or implied, with any other party for the purpose of fixing or sharing fees or other compensation to be paid for professional services rendered in these Chapter 11 Cases. No promises have been received by AlixPartners or any member thereof as to compensation in connection with these Chapter 11 Cases other than in accordance with the provisions of the Bankruptcy Code.

**Certification**

21. A Certification of Matthew Evans is attached hereto as **Exhibit C** and incorporated herein. Matthew Evans certifies that he has reviewed the requirements of Local Rule 2016-2 and that the Monthly Fee Statement substantially complies with such rule.

**Notice and No Prior Request**

22. Notice of this Monthly Fee Statement has been given to the following parties or, in lieu of, to their counsel, if known: (a) the U.S. Trustee; (b) the Official Committee of Unsecured Creditors; and (c) all parties required to be given notice in the Interim Compensation Order. AlixPartners submits that no other or further notice is necessary.

23. No prior request for the relief sought in this Monthly Fee Statement has been made to this or any other Court.

**Conclusion**

**WHEREFORE**, AlixPartners, as forensic investigation consultant to the Debtors, respectfully requests: (i) an interim allowance of compensation for professional services in the amount of \$1,103,379.25 and reimbursement of out-of-pocket expenses in the amount of \$21,288.04 for the Fee Period; (ii) that, upon the expiration of the Objection Deadline and entry of a CNO, the Debtors are authorized to pay AlixPartners fees in the amount of \$882,703.40 (80% of \$1,103,379.25) and 100% of out-of-pocket expenses in the amount of \$21,288.04, for a total amount of \$903,991.44; and (iii) such other and further relief as this Court deems proper.

Dated: February 7, 2023

ALIXPARTNERS, LLP  
909 Third Avenue, 28<sup>th</sup> Floor  
New York, New York 10022

/s/ Matthew Evans

By: Matthew Evans  
Partner & Managing Director